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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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In the Matter of	}	
	}	
Advanced Television Systems	}	MM Docket No. 87-268; FCC 96-207
and Their Impact Upon the	}	
Existing Television Broadcast	}	
Service	}	DOCKET FILE COPY ORIGINAL

INTERNATIONAL BROADCASTING NETWORK'S COMMENTS

I. Introduction

International Broadcasting Network (IBN) hereby submits its comments in response to the Commission's Fifth Further Notice of Proposed Rule Making. Comments and reply comments were submitted by IBN at an earlier stage of this proceeding. The views IBN earlier expressed are still strongly held, and we trust the Commission will give careful consideration to those viewpoints and will appropriately address them in due course. The present comments relate principally to paragraph 53 of the Fifth Further Notice and other matters of very great importance.

II. Low Power Television is Indispensable and Must Be Preserved

Over the years since the Commission introduced low power television with great fanfare and promise, hundreds of entities and individuals have labored unceasingly to serve their communities. No group of broadcasters has done more to serve the public interest than low power television broadcasters. All across the nation, these stations have firmly established their position and are indispensable to the communities they serve. It is imperative that these stations be preserved. It would be unconscionable to allow them to disappear or to be unfairly placed at a disadvantage to their competitors. IBN, along with the hundreds of other low power television licensees, has maintained its trust in the Commission to act fairly, to place the public interest above all other considerations and to resist the demands of the special interests who may be seeking to gain advantage at the expense of others.

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III. Important Issues Have Not Been Adequately Explored

Insofar as IBN is aware, little or no attention has been given to a number of important issues. These issues include public health concerns. Many television stations, and particularly those that are situated in urban areas, may be unable to transmit digital signals from their existing sites because the combined electromagnetic radiation from the digital and NTSC signals may be excessive and pose unacceptable health risks. Likewise, the enormous impact that mandatory conversion to digital television would have upon consumers, broadcasters and the national economy has not been adequately studied. The social consequences arising from the mandatory nature of the proposed conversion, the obsolescence of existing equipment and the impact upon those who may not be sufficiently affluent to replace their televisions, VCRs and related equipment has not been fully evaluated. Furthermore, the inevitable loss of free over-the-air television to many viewers has not been thoroughly considered. These issues are of immense importance, and it is essential that there be comprehensive studies conducted by independent experts before any decision is made to mandate conversion to digital television.

IV. Reasonable Alternatives Exist

Although the rationale in support of digital television seems to change from time to time, it would appear that the provision of high definition television (HDTV) to consumers is still the ultimate goal of the proposed conversion. The Commission is undoubtedly aware, however, that virtual HDTV has been available to consumers for several years. A number of manufacturers are now marketing virtual HDTV equipment in the form of scan converters, line doublers and line quadruplers. Some of these products yield picture quality comparable to 35 millimeter film and resolution far in excess of that which has been proposed by the Advisory Committee on Advanced Television Service. In view of the unprecedented costs and enormous risks which mandatory conversion to digital television would necessarily entail, it would seem that digital processing at the point of reception would be far preferable to digitizing transmissions. Consumers wishing to view film-quality television already have the means of doing that. No change by broadcasters is necessary, and governmental intrusion into the choices made by consumers may be avoided. If the Commission will let market forces operate unimpeded, and allow the citizens of our nation the freedom to make their own choices, everyone will benefit. Any attempt to force broadcasters and the public to convert to digital television would be folly of the highest magnitude.

V. The Adverse Impact May Be Mitigated

The adverse impact of a conversion to digital television may be mitigated to a substantial degree by making the conversion voluntary and protecting all existing television stations,

including the nation's 1,903 low power television stations, from displacement and interference. Any voluntary conversion should afford low power television broadcasters the same opportunity to convert that full power television stations are given. Any such conversion could be phased in, with those stations located in the largest markets and having the largest number of television households within their Grade B contours converting first. Digital channels could be staggered to increase their number and avoid interference to other stations. Alternatively, the digital bandwidth could be decreased to less than six megahertz. The essential features of any scheme for voluntary conversion should be that coercion is avoided for broadcasters and consumers alike and that all existing stations, whether full power or low power, are fully protected from displacement and interference.

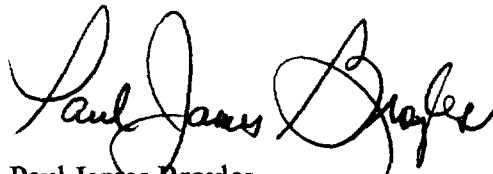
VI. Conclusion

For the reasons stated above, and for the reasons stated in IBN's earlier comments and reply comments, IBN respectfully urges that the Commission carefully consider the devastating impact that compulsory conversion from the existing NTSC television system to digital television would have upon consumers, broadcasters and the national economy, and that the Commission reject the present proposals for mandatory conversion to digital television as being contrary to the public interest and inconsistent with the preservation of universal, free, over-the-air television. If the Commission desires to implement a voluntary plan of conversion, all existing full power and low power television stations should be protected from displacement and interference.

Respectfully submitted,

INTERNATIONAL BROADCASTING NETWORK

By its President

A handwritten signature in black ink, appearing to read "Paul James Broyles". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul James Broyles

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